



M O S K O W I T Z & B O O K , L L P

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February 20, 2019

**VIA ECF and  
FIRST CLASS MAIL**

Hon. Deborah A. Batts  
United States District Court for the  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Rm. 2510  
New York, NY 10007

Re: *L & Leung Leatherware Limited v. Collection XIIX Ltd. and Lisa Nunziata*,  
No. 1:17-cv-07374-DAB

Dear Judge Batts:

We represent defendant/third-party plaintiff Lisa Nunziata and defendant/counterclaim plaintiff Collection XIIX Ltd. in the above-referenced action. We write on behalf of all counsel to request the Court's approval of a further 45-day extension of the discovery end-date and the rescheduling of other remaining pre-trial deadlines originally set forth in the Court's scheduling order dated April 12, 2018 (ECF Doc. 30), as detailed below.

Most recently, on January 3, 2019, the Court so-ordered the parties' joint December 20, 2018 letter request to extend by 60 days the discovery end-date (to February 26, 2019) and other pre-trial deadlines herein (ECF Doc. 37, a copy of which we attach).

Since that Order, defendants have conducted depositions of three fact witnesses (all foreign nationals), the parties have diligently exchanged additional document discovery, including financial information relevant to plaintiff's damages claim, and discussions regarding appropriate expert discovery have been had.

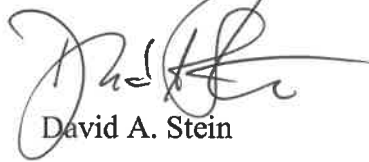
Defendants have an outstanding February 1, 2019 supplemental request for documents related to plaintiff's expert's preliminary damages analysis. To accommodate plaintiff's response to that request, and expert discovery, including depositions, we respectfully request a further extension of the discovery end-date (from February 26, 2019) and all current remaining pre-trial deadlines set forth originally in the Court's April 12, 2018 scheduling order, as follows:

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- Discovery Deadline: 4/12/2019
- Deadline to Notify Regarding Dispositive Motion: 5/13/2019
- Proposed Requests to Charge and Proposed Voir Dire Due: 7/8/2019
- Joint Pre-trial Statement ("JPTS") Due: 7/8/2019
- Memoranda of Law Addressing Issues in JPTS Due: 7/8/2019
- Responsive Memoranda Due: 7/23/2019

We thank the Court for its continued courtesies in this matter.

Respectfully yours,



David A. Stein

cc: Gerry Silver, Esq. (via ECF)



MOSKOWITZ & BOOK, LLP

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December 20, 2018

**VIA ECF and  
FIRST CLASS MAIL**

Hon. Deborah A. Batts  
United States District Court for the  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Rm. 2510  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 1/3/19

Re: *L & Leung Leatherware Limited v. Collection XIIX Ltd. and Lisa Nunziata*,  
No. 1:17-cv-07374-DAB

Dear Judge Batts:

We represent defendant/third-party plaintiff Lisa Nunziata and defendant/counterclaim plaintiff Collection XIIX Ltd. in the above-referenced action. We write on behalf of all counsel to request the Court's approval of a further 60-day extension of the discovery end-date and the rescheduling of other current remaining pre-trial deadlines originally set forth in the Court's scheduling order dated April 12, 2018 (ECF Doc. 30), as detailed below.

By Order dated September 4, 2018 (ECF Doc. 33), the Court granted the parties' joint August 31, 2018 letter motion (ECF Doc. 32), extending by 60 days the discovery end-date (to November 27, 2018) and other pre-trial deadlines.

At the parties' joint request, the Court further extended these deadlines by 30 days by Order dated November 6, 2016 (ECF Doc. 35) to accommodate the appearance of foreign nationals for deposition.

The parties already have exchanged many thousands of pages of documents and conducted five depositions. Plaintiff has requested to depose additional fact witnesses, and the parties require additional time for expert discovery and to insure completion of document disclosure. In light of the year-end holidays and the parties' diligent efforts to accommodate witnesses' schedules, we respectfully request a further extension of the discovery end-date (now

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December 27, 2018) and all current remaining pre-trial deadlines set forth originally in the Court's April 12, 2018 scheduling order, as follows:

Discovery Deadline: 2/26/2019

Deadline to Notify Regarding Dispositive Motion: 3/29/2019

Proposed Requests to Charge and Proposed Voir Dire Due: 5/24/2019

Joint Pre-trial Statement ("JPTS") Due: 5/24/2019

Memoranda of Law Addressing Issues in JPTS Due: 5/24/2019

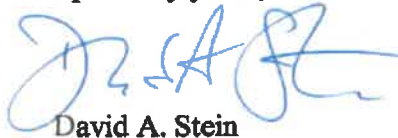
Responsive Memoranda Due: 6/7/2019

GRANTED.  
/s/ DAB  
1/3/19

The proposed extended deadlines beyond that for notifying the Court regarding dispositive motions are necessitated by defendants' counsel's observance of Passover (April 19 through April 27, 2019), and the undersigned's absence from the country from April 18 through April 29, 2019.

We thank the Court for its continued courtesies in this matter.

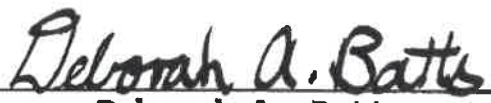
Respectfully yours,



David A. Stein

cc: Gerry Silver, Esq. (via ECF)

SO ORDERED.

  
Deborah A. Batts  
United States District Judge

1/3/19